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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 217
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

February 10, 1994

Randy Sturgeon, RPM
DE/MD Section (3HW42)
Superfund General Remedial Branch
Environmental Protection Agency, Region III
841 Chestnut Street
Philadelphia, PA 19107

Dear Mr. Sturgeon:

Thank you for providing the Department of the Interior (Department) the opportunity to review and comment on the November 1993 Proposed Remedial Action Plan (PRAP) for the Dover Gas Light Superfund Site (Site).

The 1993 Remedial Investigation Report disclosed that the coal gasification plant which operated at the Site beginning in 1859 and demolished in 1948 contaminated onsite and offsite soil and shallow ground water. The Site-related contamination consisted of several volatile organic compounds, including benzene, toluene, ethylbenzene, and xyelenes (collectively known as BTEX), and polynuclear aromatic hydrocarbons (PAHs) such as naphthalene and acenapthalene. The Remedial Investigation also disclosed widespread contamination of soil and ground water by chlorinated organic compounds; however, this contamination is believed to be related to a former dry cleaning facility. The PRAP is for the first operable unit and describes remedial alternatives that address soil contamination at the former coal gasification plant and ground-water contamination. A second operable unit will address soil contamination at the former dry cleaning facility.

Director Jonathan Deason's September 8, 1993 Preliminary Natural Resources Survey (PNRS) identified migratory birds and anadromous fish as trust resources potentially affected by Site contamination. The primary area of concern was offsite - the St. Jones River which flows within 2,500 feet of the Site. Onsite trust resources are negligible due to the Site's current use as an unpaved parking lot.

EPA's preferred remedy for Operable Unit I has two stated goals: remediate the soil to such an extent to allow for future commercial construction (expansion of the Delaware State Museum) and remediate the ground water to return the Columbia aquifer to its beneficial use (potential water supply). To achieve these goals, the EPA proposes installation of lines of ground-water recovery wells, several in the middle of the plume and one at the edge of the plume, pumping and treating the ground-water onsite until the Site reaches ground-water clean-up levels; and, excavating contaminated soils at the location of the former coal gasification plant and incinerating the soils offsite.

Data gathered as part of the Remedial Investigation disclosed that the plume of contaminated ground water is flowing in an easterly direction towards the St. Jones River and its natural resources, but that it has not yet reached the River. In addition, although St. Jones River sediments contain contaminants "similar" to the Site contaminants, and pathways for surface transport of contaminated soils may exist (i.e., storms sewers, Tar Branch), toxicity tests of sediment collected from the River indicated no threat to environmental receptors.

The Department supports the preferred remedy as a means to prevent contaminated ground water and soil from reaching the St. Jones River and potentially injuring our trust resources. In addition to the customary monitoring to verify effectiveness of the remedy, we offer the following comments and recommendations for your consideration:

1. Excavation, removal and incineration of soil contaminants is expected to temporarily increase the potential for contaminant exposure to Departmental trust resources in and associated with the St. Jones River.

(a) We recommend that the EPA minimize the increased risk during remediation to environmental receptors by developing, implementing and monitoring effective control of soil erosion.

(b) We also recommend that, after the soil remediation is completed, replacement soil be planted with a variety of soil-holding native grasses of value to migratory birds and maintained as such until the Site is converted to its planned commercial use. The Fish and Wildlife Service can provide advice on a suitable grass mixture.

2. Although the entire length of Tar Branch downstream from the Site is culverted and, therefore does not support Departmental trust resources, it remains unclear whether this creek served as a pathway for Site runoff and transport

of contaminants to the St. Jones River or may contain Site contamination at levels that could pose a risk to environmental receptors.

(a) We reiterate our PNRS recommendation that the EPA sample the sediments of Tar Branch above and below the Site to determine if the creek served as a contaminant pathway, whether it poses any continuing environmental hazard, and, if so, its need for remediation.

Thank you for requesting the Department's review and comment. If you have any questions, please contact me or Mike Chezik of our staff.

Sincerely,

Don Henne

Don Henne
Regional Environmental Officer

cc:
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